REMARKS

Claims 1-49 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the remarks.

Claims 1-49 have been rejected under 35 U.S.C. 103(a) as being unpatentable over San Andre et al. (U.S. Patent No. 5,956,489) in view of Bowman-Amuah (U.S. Patent No. 6,640,244). The Examiner stated essentially that the combined teachings of San Andre and Bowman-Amuah teach or suggest all the limitations of claims 1-49.

Claims 1 and 16 claim, *inter alia*, "combining the outcomes; determining an overall outcome based on a combination of the outcomes for each operation; and taking at least one action dependent on the overall outcome." Claim 33 claims, *inter alia*, "coupling the outcomes within the group context; determining an overall outcome of the group context; and taking at least one action dependent on the overall outcome."

It is impermissible for the Examining attorney to use hindsight in choosing citations which, when grouped together, appear to anticipate the application. Multiple cited prior art references must suggest the desirability of being combined, and the references must be viewed without the benefit of hindsight afforded by the disclosure. The Examiner has chosen a multitude of references, apparently in hindsight, to reject claims 1-49. However, each reference relates to an entirely different art. For example, San Andre teaches a method for bringing the content of an application server up-to-date with that of other applications servers (see col. 2, lines 23-30), and Bowman-Amuah teaches methods for batching logical requests for reducing network traffic (see col. 2, lines 16-26). Given the different fields of the references, e.g., updating server content and reducing network traffic, and the lack of a suggestion or motivation to combine the references,

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these references are not believed to be combinable. Reconsideration of the rejection is respectfully requested.

Respectfully, even when viewed together, the combined teachings of San Andre and Bowman-Amuah do not render the Applicants' invention obvious. At least claims 1, 2, 16, 17, 33, and 34 are believed to be allowable for additional reasons.

Referring to claims 1, 16, and 33, San Andre teaches transaction replication services on a network for updating server content (see col. 2, lines, 33-40). San Andre does not teach or suggest "determining an overall outcome based on a combination of the outcomes for each operation" as claimed in claims 1 and 16, or "determining an overall outcome of the group context" as claimed in claim 33. San Andre teaches that a single transaction is replicated on a plurality of servers on a network, wherein content data is modified on a "transaction-by-transaction" basis (see col. 9, lines 25-30). The replicated transaction of San Andre is not analogous to at least two operations, much less, two diverse operations. Nowhere does San Andre teach a combined outcome of at least two operations. Indeed, as suggest by the Examiner, San Andre is silent on combining the outcomes. Thus, San Andre does not teach or suggest "determining an overall outcome based on a combination of the outcomes for each operation" as claimed in claims 1 and 16, or "determining an overall outcome of the group context" as claimed in claim 33.

Bowman-Amuah teaches methods for batching logical requests for reducing network traffic (see col. 2, lines 16-26). Bowman-Amuah teaches that logically-related requests received from a logical unit of work are grouped into a single network message (see col. 301, lines 43-45 and Figure 185). Bowman-Amuah does not teach or suggest "determining an overall outcome based on a combination of the outcomes for each operation" as claimed in claims 1 and 16, or

"determining an overall outcome of the group context" as claimed in claim 33. Bowman-Amuah teaches the bundling of requests (see col. 301, line 38 to col. 302, line 30). The bundling of requests does not teach or suggest determining an overall outcome based on a combination, essentially as claimed in claims 1, 16, and 33. The bundle of requests represents a plurality of individual requests that are unpackable (see col. 2, lines 16-29). The bundle of requests does not represent an overall outcome. For example, Figure 187 of Bowman-Amuah clearly shows that requests are unbatched by the unbatcher for individual treatment. Nowhere does Bowman-Amuah teach or suggest a combined outcome, much less, "determining an overall outcome based on a combination of the outcomes for each operation" as claimed in claims 1 and 16, or "determining an overall outcome of the group context" as claimed in claim 33. Therefore, Bowman-Amuah fails to cure the deficiencies of San Andre.

The combined teachings or San Andre and Bowman-Amuah fail to teach or suggest "determining an overall outcome based on a combination of the outcomes for each operation" as claimed in claims 1 and 16, or "determining an overall outcome of the group context" as claimed in claim 33.

Claims 2-15 depend from claim 1. Claims 17-32 depend from claim 16. Claims 34-49 depend from claim 33. The dependent claims are believed to be allowable for at least the reasons given for independent claims 1, 16, and 33, respectively. At least claims 2, 17, and 34 are believed to be allowable for additional reasons.

Claims 2 and 17 claim, *inter alia*, "terminating the context upon taking the action" and claim 34 claims, *inter alia*, "terminating the group context upon taking one or more actions."

San Andre teaches a method for replicating the content of an application server on other application servers (see Abstract). San Andre's method proceeds on a "transaction-by-

transaction" basis (see col. 9, lines 25-30). San Andre does not teach or suggest terminating a context upon taking an action, essentially as claimed in claims 2, 17, and 34. San Andre teaches a single transaction or operation performed multiple times. Transactions are performed individually on a transaction-by-transaction basis. A context, as claimed in claims 1, 16 and 33, comprises two or more operations. Thus, a single transaction performed multiple times, as taught by San Andre is not a context as claimed in claims 2, 17 and 34. Therefore, San Andre fails to teach or suggest terminating a context upon taking an action, essentially as claimed in claims 2, 17, and 34. Accordingly San Andre fails to teach or suggest all the limitations of claims 2, 17, and 34.

Bowman-Amuah teaches batching logical requests for reducing network traffic (see col. 2, lines 16-26). Bowman-Amuah teaches that logically-related requests received from the logical unit of work are grouped and unpackaged at a point across a network (see col. 2, lines 16-29). Bowman-Amuah does not teach or suggest terminating a context upon taking an action, essentially as claimed in claims 2, 17, and 34. Bowman-Amuah's grouping and unpacking of logically-related requests does not occur upon the taking of an action. Bowman-Amuah's grouping and unpacking of logically-related requests occurs after a network transmission. The network transmission is not an action dependent on an overall outcome (see claims 1, 16, and 33). Therefore, Bowman-Amuah fails to cure the deficiencies of San Andre.

The combined teaching of San Andre and Bowman-Amuah fail to teach or suggest all the limitations of claims 2, 17, and 34, respectively.

For the forgoing reasons, the application, including claims 1-49 is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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